

INSPECTION REPORT

Inspection Entry Date/Time	09/11/2024 08:26 AM (AKT)	Announced: No
Inspection Exit Date/Time	09/11/2024 10:30 AM (AKT)	Access: Granted
Regulatory Program	Resource Conservation and Recovery Act (RCRA)	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Company Name	Seekins Ford-Lincoln, Inc.	
Facility or Site Name	Seekins Ford-Lincoln, Inc.	
Facility/Site Identifier	AKD035416007	
Facility/Site Physical Address	1625 Old Steese Hwy	
City, State, Zip Code	Fairbanks, AK 99701	
County/Borough	Fairbanks North Star Borough	
Generator Status	Very Small Quantity Generator (VSQG)	
NAICS	811114 - Specialized Automotive Repair 811121 – Automotive Body, Paint, and Interior Repair and Maintenance 81119 – Other Automotive Repair and Maintenance	
Type of Operation	Automotive Dealership	
Geographic Coordinates	64.857998, -147.686347	
Mailing Address/Secondary Address	Aaron Seekins, Customer/Employee Relations Manager Aarons@seekins.com Seekins Ford-Lincoln, Inc. 1625 Seekins Ford Drive Fairbanks, AK 99701 CC: Marty Snyder, Environmental Coordinator martys@seekins.com Margaret Russell, General Manager margaret@seekins.com	
City, State, Zip Code	Fairbanks, AK 99701	
Permit Number (If Applicable)	Not Applicable	
Lead Inspector:		
Jon Jones	Jones, Jon Digitally signed by Jones, Jon Date: 2024.11.18 12:26:44 -09'00'	
	EPA Region 10	Jones.Jon@epa.gov (907) 227-4316
Supervisor Review:		
Matthew Quarterman	MATTHEW QUARTERMAN Digitally signed by MATTHEW QUARTERMAN Date: 2024.11.19 12:56:55 -08'00'	
	EPA Region 10	Quarterman.Matthew@epa.gov (206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Seekins Ford Lincoln Mercury Facility (the "Site" or "Facility"), located at 1625 Old Steese Hwy, Fairbanks, AK 99701, at 08:26 AM (AKT) on 09/11/2024 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Marty Snyder that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Parts 262 through 273) and used oil management (40 C.F.R. Part 279). The inspection was conducted as part of a Core Program requirement for FY 2024.

This report is based on information supplied by Seekins Ford Lincoln Mercury Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA REGION 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or after the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 271-6329	jones.jon@epa.gov	Yes	Yes
Environmental Coordinator /Seekins	Marty Snyder	(907) 322-6594	martys@seekins.com	Yes	Yes
RCRA Inspector-in-training/ADEC	Emily Vannortwick	(907)-269-4580	emily.vannortwick@alaska.gov	Yes	Yes

Opening Conference

EPA Region 10 inspector Jon Jones and ADEC inspector in training. Emily VanNortwick arrived at Seekins Ford Lincoln at 8:26AM. We met with employees at the front desk and informed them that this was an unannounced RCRA inspection and asked for the manager. After about ten minutes, Marty Synder arrived and introduced himself as the environmental manager for this facility.

We then presented our credentials to Mr. Snyder and explained that this was a routine RCRA hazardous waste inspection that would be focusing on identifying types of waste, points of generation, methods of waste management, and a review of relevant documents which would include three years of weekly inspections, manifests, and any employee hazardous waste training provided by Seekins Ford. Mr. Snyder took us to a conference room where we began the opening conference. When asked about their hazardous waste generation and management, Mr. Snyder explained that they generate fluorescent bulbs, paint related waste, fuel waste, and used oil.

Mr. Snyder informed the inspectors that they used to burn their own used oil years ago, but do not anymore. Now their oil is stored on site and routinely shipped out for recycling using Republic Services. With this summary of their hazardous waste management, Mr. Snyder and the inspectors opted to begin the walk-through portion of the inspection.

Facility/Site Information

What type of generator facility verified as?	Mr. Snyder verified his facility's generator status was Very Small Quantity Generator (VSQG)
What type of generator facility notified?	Small Quantity Generator (SQG)
Size of Facility	71,765 square feet
Safety Training Provided to Inspector(s)?	No
Operating Hours	7:00AM to 7:00PM Monday through Friday, 7:00AM to 6:00PM Saturday, and closed on Sunday
Length of Facility at Location	43 Years
Number of employees	90 - 100

Process Description

Seekins Ford Lincoln is a car dealership and service shop located in Fairbanks, AK. The location that was inspected performs all types of automotive related work to include repairs, body work, transmission work, paint jobs, etc. At the time of the inspection, Marty Snyder informed inspectors that they produce several types of hazardous and universal waste, including fluorescent bulbs, used oil, acetone paint waste, contaminated waste fuel, used batteries, and aerosol cans.

The facility used to burn used oil years ago, but use gas heaters now and no longer do this, sending their used oil off to be recycled after being stored on site for a time. The company that picks up their used oil is Republic Services. Used batteries are also stored onsite and regularly sent out for recycling. Hazardous and universal wastes are sent out on an as-needed basis with no set schedule.

During the inspection, inspectors examined the facility's processes, hazardous waste management practices, points of generation, and accumulation areas. Also observed was the facility's universal waste management practices. Specific areas that were inspected are listed below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Body Shop	Used oil, aerosol cans and fluorescent bulbs	No
Paint mix room	Satellite Accumulation Area (SAA)	No
Service Shop	Used oil storage	Yes
Detail shop	Waste aerosol can puncture	No
Electrical room	Universal waste lamp storage	Yes
Parts area	Recycled automotive batteries	Yes
Quick Lane	Used oil collection and storage	No
Service Bays	Used oil collection and storage	Yes
Used Oil Storage	Main storage for used oil	Yes

SECTION II – OBSERVATIONS

Building: Service Shop/Used Oil Storage			
Observation #: JJ1-OB-001	Date: 09/11/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Marty Snyder		Title: Environmental Coordinator	
When we asked about where used oil is stored, we were directed to the back of the building where I observed two above ground storage tanks totaling 20,000 gallons in capacity. The amount of oil in the tanks at the time of the inspection was unknown. Mr. Snyder said Republic (formerly US Ecology) pumped out the tanks two months ago. At the time of the inspection, the facility had not labeled the tanks with the words "Used Oil." There was a concrete wall concealing the tanks that the facility had also not labeled. On 10/02/2024, Marty Snyder sent a photo showing facility personnel had labeled the tanks with the words "Used Oil."			
Photo(s)			
1. IMG-20240911085844584489387.jpg			

Building: Service Shop/Service Bays			
Observation #: JJ1-OB-002	Date: 09/11/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Marty Snyder		Title: Environmental Coordinator	
At the south end of a service bay within the service shop, I observed a universal waste aerosol container that facility personnel labeled with the words "Used Aerosols." At the time of the inspection, the container was not closed and there were two aerosol cans inside the container.			
Photo(s)			
1. IMG-2024091109091691686111.jpg			
2. IMG-2024091109092392355451.jpg			

Building: Service Shop/Paint Mix Room			
Observation #: JJ1-OB-003	Date: 09/11/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Marty Snyder		Title: Environmental Coordinator	
Within the service shop, we visited the paint mixing room. I observed a 55-gallon SAA drum that the facility was using to accumulate solvent waste. Facility personnel labeled the container with the words "Hazardous Waste," but did not mark it with a hazardous waste indicator. The lid to the funnel mechanism at the top was ajar. The lid was closed during the inspection. At the time of the inspection, the facility was operating as a VSQG and although the labeling and marking containers is a good practice, it's not required for a VSQG.			

Photo(s)

1. [IMG-202409110915431543103815.jpg](#)
2. [IMG-202409110916011612118514.jpg](#)
3. [IMG-202409110916091692029574.jpg](#)
4. [IMG-2024091109164516451886465.jpg](#)
6. [IMG-202409110920062062020777.jpg](#)

Building: Service Shop/Electrical room**Observation #:** JJ1-OB-004 **Date:** 09/11/2024 **Contains AOC:** Yes **Contains CBI:** No**Person Interviewed:** Marty Snyder **Title:** Environmental Coordinator

In the electrical room, I observed five boxes containing used fluorescent lamps that the facility labeled "Used Fluorescent Lamps." The facility labeled four of the five boxes with the date 8-22-2024. According to Mr. Snyder the facility replaces all of their lamps at one time. During the inspection, we saw one box the facility had not closed or marked with the date the lamps first became a waste.

On 10/02/2024, Marty Snyder sent a photo showing that the facility closed and dated that box of used lamps.

Photo(s)

1. [IMG-2024091109274327431670088.jpg](#)

Building: Service Shop/Service Bays**Observation #:** JJ1-OB-005 **Date:** 09/11/2024 **Contains AOC:** Yes **Contains CBI:** No**Person Interviewed:** Marty Snyder **Title:** Environmental Coordinator

In the service bays, I observed a rolling used oil collection container with faded and illegible labeling. I explained that containers storing used oil were required to be clearly marked with the words "Used Oil."

Photo(s)

1. [IMG-2024091109332933291992439.jpg](#)
2. [IMG-2024091109031631682225.jpg](#)
3. [IMG-2024091109033833879665.jpg](#)

Building: Service Shop/Parts area**Observation #:** JJ1-OB-006 **Date:** 09/11/2024 **Contains AOC:** Yes **Contains CBI:** No**Person Interviewed:** Marty Snyder **Title:** Environmental Coordinator

In the parts area, I observed a large container of used automotive batteries. According to onsite personnel, the facility recycles their used batteries through Airland Factory Motor Parts, and they ultimately end up at a lead smelter. At the time of the inspection, the facility did not have a Land Disposal Restriction Notice (LDR) on file for the batteries.

Photo(s)

1. [IMG-2024091109434243421804025.jpg](#)

SECTION III – RECORDS REVIEW

Record: Shipping Documents/Tolling agreements		AOC: No
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 09/11/2024
We inspected relevant paperwork and manifests while at the facility and identified no areas of concern.		

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: Service Shop	Area: Used Oil Storage	Sub-area:
JJ1-OB-001		
Used oil storage tanks not labeled with the words "Used Oil." On 10/02/2024, Marty Snyder sent a photo showing the facility labeled the tanks with the words "Used Oil."	Regulation:	Sections:
Building: Service Shop	Area: Electrical room	Sub-area:
JJ1-OB-004		
A container of universal waste lamps was not closed or marked with the date the lamps first became a waste. On 10/02/2024, Marty Snyder sent a photo showing the facility had closed and dated that container.	Regulation:	Sections:
Building: Service Shop	Area: Service Bays	Sub-area:
JJ1-OB-005		
Facility personnel had not legibly labeled a used oil receiver with the words "Used Oil."	Regulation:	Sections:
Building: Service Shop	Area: Parts area	Sub-area:

JJ1-OB-006		
There was no LDR on file at the facility for the waste automotive batteries the facility was recycling, and their recycler sends the batteries to a lead smelter.	Regulation:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked Mr. Snyder for his time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that we observed during my inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern documented violations.

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.**SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



20,000 Gallon Used Oil Tanks			IMG-20240911085844584489387.jpg
09/11/2024 08:58 AM	No CBI	No PII	Photographer: Emily Vannortwick
Service Shop/Used Oil Storage			[Geographic Coordinates]
The two above ground tanks serving as used oil storage, each tank totals 10,000 gallons in capacity. The tanks are missing a "Used Oil" label.			



Used Oil Pump			IMG-2024091109031631682225.jpg
09/11/2024 09:03 AM	No CBI	No PII	Photographer: Emily Vannortwick
Service Shop/Service Bays			[Geographic Coordinates]
This is where used oil is accumulated and pumped into the 10,000-gallon tanks for storage and pickup.			



Rolling Used Oil Container			IMG-2024091109033833879665.jpg
09/11/2024 09:03 AM	No CBI	No PII	Photographer: Emily Vannortwick
Service Shop/Service Bays			[Geographic Coordinates]
This is a rolling used oil container, of which there are 25-30 in the entire facility.			



Open Aerosol Can Container			IMG-2024091109091691686111.jpg
09/11/2024 09:09 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Service Bays			64.85663314, -147.67855281
Universal waste aerosol container at south end of service shop. The container is not marked with the date that waste aerosol cans first became a waste.			



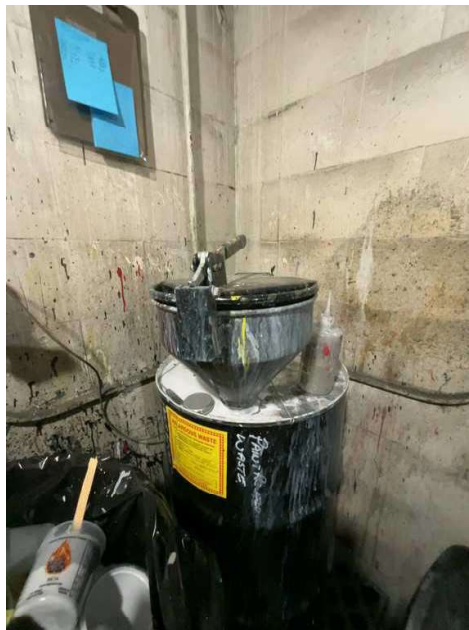
Open Aerosol Can Container			IMG-2024091109092392355451.jpg
09/11/2024 09:09 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Service Bays			64.85663122, -147.67882807
Second photo showing the inside of the universal waste aerosol container at south end of service shop.			



Waste paint SAA			IMG-202409110915431543103815.jpg
09/11/2024 09:15 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Paint Mix Room			64.85656971, -147.67935409
Waste paint SAA, the lid on the funnel mechanism is ajar and the drum does not have a hazard indicator.			



Waste paint SAA			IMG-202409110916011612118514.jpg
09/11/2024 09:16 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Paint Mix Room			64.8565631, -147.67931904
Second photo of waste paint SAA, the lid on the funnel mechanism is ajar and the drum does not have a hazard indicator.			



Paint Waste SAA			IMG-202409110916091692029574.jpg
09/11/2024 09:16 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Paint Mix Room			64.85656613, -147.6793246
Third photo of waste paint SAA, the lid on the funnel was closed per us informing Mr. Snyder, but it still lacks a hazard indicator.			



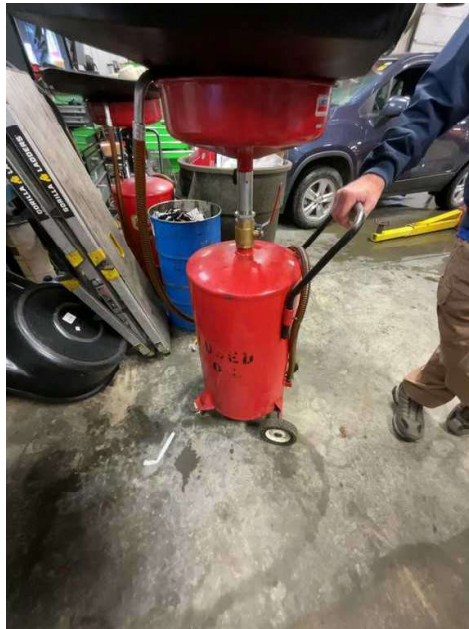
Acetone Waste Container			IMG-2024091109164516451886465.jpg
09/11/2024 09:16 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Paint Mix Room			64.85653923, -147.67926294
Photo of acetone container.			



Paint Waste SAA			IMG-202409110920062062020777.jpg
09/11/2024 09:20 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Paint Mix Room			64.85659903, -147.67921588
Fourth photo of the waste paint SAA funnel mechanism that was closed at the time of the inspection			



Used Fluorescent Bulbs			IMG-2024091109274327431670088.jpg
09/11/2024 09:27 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Electrical room			64.85670254, -147.67929876
View of box of used fluorescent lamps that is not closed or dated.			



Faded Used Oil Label			IMG-2024091109332933291992439.jpg
09/11/2024 09:33 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Service Bays			64.85687461, -147.67939955
A rolling used oil collection container with the "Used Oil" label worn off.			



Used Batteries			IMG-2024091109434243421804025.jpg
09/11/2024 09:43 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Service Shop/Parts area			64.85684108, -147.67909679
A box of used batteries that is awaiting shipment to a recycling facility.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Communications	FW_ corrections.pdf	No	No	Jon Jones	10/07/2024